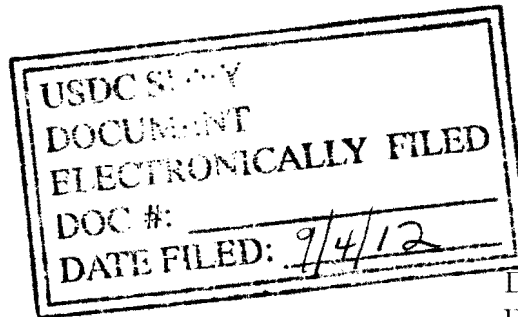
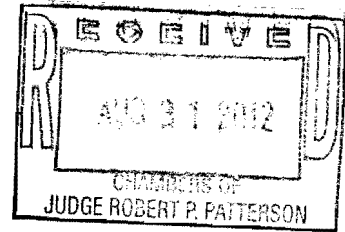


**MEMO ENDORSED**

STROOCK



August 30, 2012

By Hand

Curtis C. Mechling  
Direct Dial: 212-806-5609  
Direct Fax: 212-806-2609  
cmechling@stroock.com

Honorable Robert P. Patterson  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Levin v. Bank of New York, et al., Case No. 09 cv 5900 (RPP) (MHD)

Dear Judge Patterson:

Enclosed please find a courtesy copy of the Motion for Partial Summary Judgment on Claims of Turnover of Phase Two Blocked Assets being jointly filed by the Levin plaintiffs and third-party defendants and counterclaim plaintiffs the Greenbaum, Acosta and Heiser Judgment Creditors (collectively, the "Judgment Creditors").

Each of defendants and third-party plaintiffs the Bank of New York Mellon, Societe Generale, Citibank, N.A., and JPMorgan Chase Bank, N.A. and JPMorgan Chase & Co. (collectively, the "New York Banks") is being served with an individualized, partially-redacted copy of the Motion, specifically prepared pursuant to the terms of the protective orders entered in these proceedings.

As this Court is aware, the New York Banks interpleaded hundreds of third-party defendants, including both commercial third-party defendants (most of whom were parties to underlying blocked wire transfers) and other judgment creditors of Iran. All these parties have been served electronically with fully-redacted copies of the Motion. Due to the large number of parties and the great burden of preparing individualized, separately redacted versions of the Motion for particular third-party defendants, the Judgment Creditors respectfully propose the following process for serving un-redacted copies of the Motion on third-party defendants:

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- Any commercial third-party defendants wishing to receive an unredacted<sup>1</sup> copy of the Motion shall, within 7 days of this Court approving these procedures, contact counsel for the Judgment Creditors to identify the requesting commercial third-party defendant; and
- Any other third-party defendant judgment creditors of Iran wishing to receive an unredacted copy of the Motion shall, within 7 days of this Court approving these procedures, contact counsel for the Judgment Creditors to: (1) identify the requesting party or parties, and (2) confirm whether counsel of record for such party or parties is a signatory to the stipulated Protective Order entered in these proceedings (a copy of which is annexed to this letter) and/or return an executed copy of the acknowledgement form appended to such confidentiality order so as to entitle to such party or parties to receive a fully unredacted copy of the Motion.
- Absent an affirmative request, as delineated above, the Judgment Creditors shall have no obligation to serve an unredacted copy of the Motion on any third-party defendant.

*Appellate  
Hon. Patterson  
are approved  
But for the  
9/2/12*

Finally, we have spoken with Your Honor's courtroom deputy, who confirmed the Court's availability for a hearing on the Motion on October 30, 2012, at 1:00 p.m. and indicated that such date and time was preferable to the noticed date of October 26. Based upon this hearing date, the Judgment Creditors respectfully propose the following briefing schedule:

- Opposition papers due September 27, 2012; and
- Reply papers due October 18, 2012.

*So ordered  
9/6/12 R. Patterson  
USDC  
9/12/12*

Respectfully submitted,

*Curtis C. Mechling*  
Curtis C. Mechling

Enclosures

cc: All counsel of record (by electronic email with partial enclosure)

<sup>1</sup> Pursuant to the protective orders entered in these proceedings, any commercial third-party defendant requesting an unredacted copy of the Motion will receive a partially unredacted copy revealing Confidential Information only as it pertains to the specific blocked asset or assets relevant to that party.